

REMARKS

This is in response to the Final Rejection of the pending claims in the Office Action mailed October 10, 2006.

Claims 1 through 7 are currently pending in the application.

Claims 1 through 7 stand rejected.

Applicant proposes to amend claims 1, 3, 4, 6, and 7, and respectfully request reconsideration of the application as proposed to be amended herein.

35 U.S.C. § 102(e) Anticipation Rejections

Anticipation Rejection Based on U.S. Patent 5,909,633 to Haji et al.

Claims 1, 3, 4 and 6 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Haji et al. (U.S. Patent 5,909,633). Applicant respectfully traverses this rejection, as hereinafter set forth.

Applicant asserts that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.

Verdegaal Brothers v. Union Oil Co. of California, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Applicant asserts that the Haji et al. reference cannot and does not anticipate the claimed inventions of presently amended independent claims 1, 3, 4, and 6 under 35 U.S.C. § 102 because the Haji et al. reference does not identically describe, either expressly or inherently, each and every element of the claimed inventions in as complete detail as contained in the claims. Applicant asserts that the Haji et al. reference does not identically describe the element of the claimed inventions of presently amended independent claims 1, 3, 4, and 6 calling for “consuming a portion of the at least one layer of metal during the connecting of one end of a conductive lead of a TAB tape”. Applicant asserts that the Haji et al. reference contains no such description whatsoever. Accordingly, presently amended independent claims 1, 3, 4 and 6 are allowable as well as the dependent claims therefrom.

35 U.S.C. § 103(a) Obviousness Rejections

Obviousness Rejection Based on U.S. Patent 5,909,633 to Haji et al. in view of U.S. Patent 5,848,467 to Khandros et al.

Claims 1, 2, 5 and 7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Haji et al. (U.S. Patent 5,909,633) in view of Khandros et al. (U.S. Patent 5,848,467). Applicant respectfully traverses this rejection, as hereinafter set forth.

M.P.E.P. 706.02(j) sets forth the standard for a Section 103(a) rejection:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (Emphasis added).

Applicant asserts that any combination of the Haji et al. reference in view of the Khandros et al. reference does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1, 4, and 7 under 35 U.S.C. § 103 because any combination of the Haji et al. reference in view of the Khandros et al. reference does not teach or suggest all the claim limitations of the claimed inventions. Applicant asserts that there is no teaching or suggestion whatsoever in either the Haji et al. reference, the Khandros et al. reference, or any combination of the Haji et al. reference in view of the Khandros et al. reference for the claim limitation of independent claims 1, 4, and 7 calling for "consuming a portion of the at least one layer of metal during the connecting of one end of a conductive lead of a TAB tape". Therefore, presently amended independent claims 1, 4 and 7 are allowable as well as dependent claims 2 and 5.

ENTRY OF AMENDMENTS

The proposed amendments to claims 1, 3, 4, 6, and 7 above should be entered by the Examiner because the amendments are supported by the as-filed specification and drawings and do not add any new matter to the application under 35 U.S.C. § 132. Further, the amendments do not raise new issues or require a further search. Finally, if the Examiner determines that the amendments do not place the application in condition for allowance, entry is respectfully requested upon filing of a Notice of Appeal herein.

CONCLUSION

Claims 1 through 7 are believed to be in condition for allowance, and an early notice thereof is respectfully solicited. Should the Examiner determine that additional issues remain which might be resolved by a telephone conference, he is respectfully invited to contact Applicant's undersigned attorney.

Respectfully submitted,



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Date: December 7, 2006
JRD/sfc:lmh
Document in ProLaw